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6 **UNITED STATES DISTRICT COURT**
7 **WESTERN DISTRICT OF WASHINGTON**
8 **AT SEATTLE**

9 DEBBIE CHAVES, DANIELLE WARD, and
10 AMANDA EVANS, on behalf of themselves
11 and all others similarly situated,

12 Plaintiffs,

13 v.

14 AMAZON.COM SERVICES LLC,

15 Defendant.
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Case No.: 2:21-cv-01213-JCC

**JOINT STIPULATION AND ORDER
EXTENDING AND STAYING
DEADLINES**

Hon. John C. Coughenour

1 Plaintiff Debbie Chaves, Danielle Ward, and Amanda Evans (“Plaintiff”) and Defendant
2 Amazon.com Services LLC (“Defendant”), by and through their undersigned counsel of record,
3 hereby set forth as follows:

4 WHEREAS, on September 23, 2021, the Court entered an Order permitting Plaintiffs to
5 file a First Amended Complaint, which did not constitute Plaintiff’s amendment as of right under
6 Fed. R. Civ. P. 15(a)(1)(A) (ECF No. 8);

7 WHEREAS, on October 8, 2021, Plaintiffs filed their First Amended Complaint (ECF
8 No. 13);

9 WHEREAS, on November 22, 2021, Defendant filed its Motion to Dismiss the First
10 Amended Complaint, with a noting date of December 17, 2021 (ECF No. 18);

11 WHEREAS, pursuant to Local Rule 7(d)(3), Plaintiffs’ date to respond to the Motion to
12 Dismiss is December 13, 2021;

13 WHEREAS, Plaintiffs intend to file their Second Amended Complaint as of right
14 pursuant to Fed. R. Civ. P. 15(a)(1)(A) in response to the Motion to Dismiss, but require
15 additional time to prepare the Second Amended Complaint in light of the holidays and pre-
16 existing travel plans;

17 WHEREAS, Defendant does not oppose Plaintiffs’ request, but requires additional time
18 to prepare a response to the Second Amended Complaint;

19 WHEREAS, the Parties believe that judicial economy will be preserved by staying all
20 other deadlines—including the deadline for the Parties to meet and confer pursuant to Fed. R.
21 Civ. P. 26(f) and file a proposed case management statement—until the resolution of
22 Defendant’s forthcoming Motion to Dismiss.

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26 JOINT STIPULATION
CASE NO. 2:21-CV-01213-JCC

BURSOR & FISHER, P.A.
1990 NORTH CALIFORNIA BLVD., SUITE 940
WALNUT CREEK, CA 94596

WHEREAS good cause exists;

The Parties hereby stipulate as follows:

1. Plaintiffs shall file their Second Amended Complaint pursuant to Fed. R. Civ. P. 15(a)(1)(A) no later than **December 31, 2021**.
2. Defendant shall answer or otherwise respond to the Second Amended Complaint no later than **February 7, 2022**.
3. All other deadlines—including the deadline for the Parties to meet and confer pursuant to Fed. R. Civ. P. 26(f) and file a proposed case management statement—shall be stayed pending resolution of Defendant’s forthcoming Motion to Dismiss.

Dated: November 29, 2021

Respectfully submitted,

CARSON NOEL PLLC

FENWICK & WEST LLP

By: /s/ Wright A. Noel
Wright A. Noel
20 Sixth Avenue NE
Issaquah, WA 98027
Telephone: (425) 837-4717
E-Mail: wright@carsonnoel.com

By: /s/ Brian D. Buckley
Brian D. Buckley
1191 Second Avenue, 10th Floor
Seattle, WA 98101
Telephone: (206) 389-4515
E-Mail: bbuckley@fenwick.com

BURSOR & FISHER, P.A.
L. Timothy Fisher (*Pro Hac Vice*)
1990 N. California Blvd., Suite 940
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Facsimile: (925) 407-2700
E-Mail: ltfisher@bursor.com

Attorneys for Defendant

BURSOR & FISHER, P.A.

Max S. Roberts (*Pro Hac Vice*)

Matthew A. Girardi*

Julian C. Diamond*

888 Seventh Avenue

New York, NY 10019

Telephone: (646) 837-7150

E-Mail: mroberts@bursor.com

mgirardi@bursor.com

jdiamond@bursor.com

**Pro Hac Vice Forthcoming*

Attorneys for Plaintiff

SO ORDERED this 29th day of November 2021.



John C. Coughenour
UNITED STATES DISTRICT JUDGE